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Task Order LM00-502
Control Number 08-0038

March 20, 2008

U.S. Department of Energy
Office of Legacy Management
ATTN: Scott Surovchak
Site Manager
11025 Dover Street, Suite 1000
Denver, CO 80021

SUBJECT: Contract No. DE-AM01-07LM00060, Stoller
Transmittal of the Present Landfill Monitoring and Maintenance Plan and Post-Closure Plan (PLF M&M Plan) and Rocky Flats Legacy Management Agreement (RFLMA) Attachment 2 Modification Request

REFERENCE: LM00-502-06-510, Rocky Flats, CO, Site

Dear Mr. Surovchak:

Enclosed is the modified *PLF M&M Plan*, DOE-LM/1592-2008, dated March 2008, for DOE transmittal to CDPHE for review and approval.

The modification is made to reflect changes to inspection frequencies, completion of certain monitoring requirements that now may be phased out, clarification of vegetation inspection schedules, and completion criteria. The modification also revises the May 2006 *PLF M&M Plan* text to recognize the implementation of the remedy under RFLMA. Figures 1-1, "Location Map," and 1-2, "PLF Site Map," were replaced with more current versions, reflecting the post-closure nomenclature and configuration.

Because RFLMA Attachment 2, "Legacy Management Requirements," contains references to the May 2006 *PLF M&M Plan*, as well as PLF monitoring and inspection criteria, a modification to relevant portions of RFLMA Attachment 2 is also required. Enclosed are the modified RFLMA Attachment 2 replacement pages, dated March 2008, for DOE transmittal to CDPHE for review and approval.

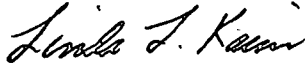
Pursuant to RFLMA, Section 10, -paragraph 66, public notice is required for any modifications of attachments. We will follow the community-notification and Web-posting protocol to provide notice of the modification request and the final CDPHE-approved modification. As documented in Contact Record 2007-08, this modification is not significant and, therefore, does not require a public comment period.

ADMIN RECORD

PD-A-000052

If you have any questions regarding the information in this letter or the enclosures, please let me know.

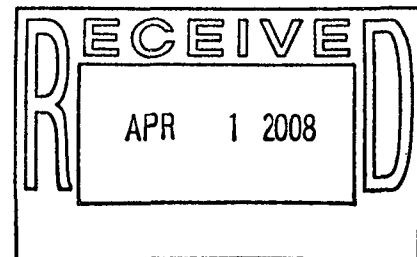
Sincerely,



Linda L. Kaiser
Project Manager

MGH/abm
Enclosures

cc: Correspondence Control File (thru C. Weston/D. Crawford)
Post-Closure Administrative Record
rc-rocky.flats



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- **RCRA Wells**: Dedicated to monitoring the Present Landfill and Original Landfill.

5.3 Remedy Monitoring and Maintenance

5.3.1 Original Landfill

Groundwater and surface water monitoring details, including criteria and analytes, are listed in Table 2. Table 3 summarizes the inspection and maintenance requirements contained in the *Final Landfill Monitoring and Maintenance Plan, RFETS, Original Landfill*, DOE, 2006, which is incorporated by reference as an enforceable requirement of the RFLMA.

5.3.2 Present Landfill

Groundwater and surface water monitoring details, including criteria and analytes, are listed in Table 2. Table 3 summarizes the inspection and maintenance requirements contained in the approved *Present Landfill Monitoring and Maintenance Plan and Post-Closure Plan*, which is incorporated by reference as an enforceable requirement of the RFLMA.

5.3.3 Groundwater Treatment Systems

Each system will be monitored, at a minimum, for untreated influent and treated effluent, and for impacts to surface water downstream of the effluent discharge point according to the sampling criteria in Table 2 and the decision rules in the attached flowcharts. The systems will be maintained to ensure the effluent meets Table 1 standards.

5.3.4 Residual Subsurface Contamination

The Central OU will be monitored for significant erosion annually and following major precipitation events. DOE will evaluate whether the erosion is in proximity to the subsurface features shown in Figures 3 and 4. Monitoring will include visual observation (and measurements, if necessary) of precursor evidence of significant erosion (cracks, rills, slumping, subsidence, sediment deposition, etc.).

5.3.5 Monitoring Physical Controls

The condition of signs and other physical controls maintained by DOE will be inspected on a quarterly basis.

5.3.6 Monitoring Institutional Controls

The effectiveness of the institutional controls described in Table 4 of this attachment and in the Environmental Covenant will be determined by inspecting the Central OU at least annually for any evidence of violations of those controls. DOE will also annually verify that

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Table 2. Water Monitoring Locations and Sampling Criteria

General Objective	Classification	Media	Location ID (1)	Location Description	Frequency	Analytes (4)
Points of Compliance (POCs)	POC (5)	SW	GS01	Woman Creek at Indiana Street	Flow-paced (varies)	Pu, Am, isotopic U ²³⁵ , flow rate
	POC (5)	SW	GS03	Walnut Creek at Indiana Street	Flow-paced (varies)	Pu, Am, isotopic U ²³⁵ , nitrate (pond discharges only), flow rate
	POC (5)	SW	GS08	Pond B-5 outlet	Flow-paced (varies)	Pu, Am, isotopic U ²³⁵ , nitrate, flow rate
	POC (5)	SW	GS11	Pond A-4 outlet	Flow-paced (varies)	Pu, Am, isotopic U ²³⁵ , nitrate, flow rate
Points of Evaluation (POEs)	POC (5)	SW	GS31	Pond C-2 outlet	Flow-paced (varies)	Pu, Am, isotopic U ²³⁵ , flow rate
	POE (6)	SW	GS10	S. Walnut Creek at B-Series Bypass	Flow-paced (varies)	Pu, Am, isotopic U ²³⁵ , dissolved Ag and Cd, total Be and Cr, flow rate
	POE (6)	SW	SW027	SID at Pond C-2	Flow-paced (varies)	Pu, Am, isotopic U ²³⁵ , dissolved Ag and Cd, total Be and Cr, flow rate
	POE (6)	SW	SW093	N. Walnut Creek at end of FC-3	Flow-paced (varies)	Pu, Am, isotopic U ²³⁵ , dissolved Ag and Cd, total Be and Cr, flow rate
Boundary Wells	Boundary (7)	GW	10394	Woman Creek at Indiana Street	Annual	VOCs, U, nitrate
	Boundary (7)	GW	41691	Walnut Creek at Indiana Street	Annual	VOCs, U, nitrate
Present Landfill (PLF) Area (2)	RCRA (10)	GW	70193	Upgradient	Quarterly	VOCs, metals
	RCRA (10)	GW	70393	Upgradient	Quarterly	VOCs, metals
	RCRA (10)	GW	70693	Upgradient	Quarterly	VOCs, metals
	RCRA (10)	GW	73005	Downgradient	Quarterly	VOCs, metals
	RCRA (10)	GW	73105	Downgradient	Quarterly	VOCs, metals
	RCRA (10)	GW	73205	Downgradient	Quarterly	VOCs, metals
	AOC (7)	GW	4087	Below East Landfill Pond	Semiannual	VOCs, U, nitrate
	AOC (7)	GW	B206989	Below East Landfill Pond	Semiannual	VOCs, U, nitrate
	Treatment System (11)	GW	PLFSEEPINF	Seep influent to treatment system	Quarterly	VOCs, isotopic U ²³⁵ , metals, instantaneous flow rate
	Treatment System (11)	GW	GWISINFNORTH	North GWIS influent to treatment system	Discontinued	VOCs, isotopic U ²³⁵ , metals, nitrate
	Treatment System (11)	GW	GWISINF SOUTH	South GWIS influent to treatment system	Discontinued	VOCs, isotopic U ²³⁵ , metals, nitrate
	Treatment System (11)	SW	PLFSYSEFF	Treatment system effluent	Quarterly, Monthly (if required by decision)	VOCs, SVOCs, isotopic U ²³⁵ , metals
Original Landfill (OLF) Area (3)	Treatment System (11)	SW	PLFPONDEFF	East Landfill Pond at outlet	As required by decision rule	As required by decision rule
	RCRA (10)	GW	P416589	Upgradient	Quarterly	VOCs, metals, SVOCs
	RCRA (10)	GW	80005	Downgradient	Quarterly	VOCs, metals, SVOCs
	RCRA (10)	GW	80105	Downgradient	Quarterly	VOCs, metals, SVOCs
	RCRA (10)	GW	80205	Downgradient	Quarterly	VOCs, metals, SVOCs
	AOC (7)	GW	11104	Downgradient, downstream	Semiannual	VOCs, U
Mound Site Plume and Treatment System (MSPTS)	OLF SW (12)	SW	GS05	Woman Creek at west property line (upstream)	Quarterly, Monthly (if required by decision)	VOCs, isotopic U ²³⁵ , metals
	OLF SW (12)	SW	GS59	Woman Creek 700 feet east of OLF (downstream)	Quarterly, Monthly (if required by decision)	VOCs, isotopic U ²³⁵ , metals
	Evaluation (9)	GW	00897	Source area	Biennial	VOCs
	Sentinel (6)	GW	15699	Downgradient of intercept trench	Semiannual	VOCs
	Treatment System (11)	GW	MOUND R1-0	Treatment system influent	Semiannual	VOCs
	Treatment System (11)	GW	MOUND R2-E	Treatment system effluent	Semiannual	VOCs
Mound Site Plume and Treatment System (MSPTS)	Treatment System (11)	SW	GS10	S. Walnut Creek at B-Series Bypass	Semiannual	VOCs

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Table 2 (continued). Water Monitoring Locations and Sampling Criteria

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Table 3. Present and Original Landfill Inspection and Maintenance Requirements

Present Landfill

Requirement	Description of activity	Frequency	Documentation/Reporting	Exit strategy
Final cover inspection and monitoring	inspect/monitor slope stability, soil cover visually inspect surface of landfill cover for cracks, depressions, heaving, and sinkholes monitor settlement monuments and side slope stability monuments vegetation monitoring	quarterly (settlement and stability monuments annually); evaluate frequency during CERCLA periodic review additional weather-related inspections within 2 days after storm event of one inch or more of rain in a 24-hour period or significant melt of 10-inch or more snowstorm Monthly for noxious weeds during growing season (April-Sept.). Annually for vegetation	conditions affecting effectiveness of landfill cover to be reported per note 1 below document on inspection checklist; submit to parties within one month of inspection; include in quarterly and annual reports	Consultative process or periodic CERCLA review Vegetation monitoring performed until PLF M&M Plan grassland success criteria are met
Inspection and monitoring of stormwater management system and erosion control features	Visually inspect stormwater management structures (channels/lining, culverts, and outfalls); erosion control features (perimeter channels and natural drainages); and seep treatment system	monthly for first year; evaluate frequency during CERCLA periodic review additional weather-related inspections within 2 days after storm event of one inch or more of rain in a 24-hour period or significant melt of 10-inch or more snowstorm	conditions affecting effectiveness of landfill cover to be reported per note 1 below document on inspection checklist; submit to parties within one month of inspection; include in quarterly and annual reports	Consultative process or periodic CERCLA review
GW monitoring	Included in Table 2, Figure 1, and Figure 10	Included in Table 2, Figure 1, and Figure 10	Included in Table 2, Figure 1, and Figure 10	Included in Table 2, Figure 1, and Figure 10
Landfill seep and pond monitoring	Included in Table 2, Figure 1, and Figure 11	Included in Table 2, Figure 1, and Figure 11	Included in Table 2, Figure 1, and Figure 11	Included in Table 2, Figure 1, and Figure 11
Maintenance and repairs	Perform minor or major repairs as needed; for major damage or repairs, consult with parties and develop appropriate actions for approval by CDPHE	as needed	minor/routine repairs and maintenance report on inspection form conditions affecting effectiveness of landfill cover to be reported per note 1 below	Consultative process or periodic CERCLA review
Institutional and physical controls	Fence around perimeter of Central OU, signs at entry points to Central OU, warning signs in accordance with 6 CCR 1007-3 Part 265.14		failure of physical controls to be reported per note 1 below failure of institutional controls to be per note 2 below	Consultative process or periodic CERCLA review

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